

DIRECT TESTIMONY  
OF  
NANCY B. WEBER

**OFFICIAL FILE**

I.C.C. DOCKET NO. 01-0662  
ICC Staff Exhibit No. 11.0  
Witness NB Weber  
Date 2/1/02 Reporter KM

TELECOMMUNICATIONS DIVISION  
ILLINOIS COMMERCE COMMISSION

ICC ON ITS OWN MOTION  
INVESTIGATION CONCERNING ILLINOIS BELL TELEPHONE COMPANY'S  
COMPLIANCE WITH SECTION 271 OF THE TELECOMMUNICATIONS ACT  
OF 1996

DOCKET NO. 01-0662 (Phase 1)

MARCH 20, 2002

1    **Q.    Please state your name and business address.**

2    A.    My name is Nancy B. Weber, and my business address is 160 North  
3        LaSalle, Suite C-800, Chicago, Illinois, 60601.

4  
5    **Q.    By whom are you currently employed and in what capacity?**

6    A.    I am currently employed by the Illinois Commerce Commission  
7        ("Commission") in the Telecommunications Division as the Project  
8        Manager for the independent third party review of Ameritech Illinois'  
9        Operation Support Systems ("OSS") being conducted by KPMG  
10       Consulting pursuant to Condition 29 of the Ameritech Illinois Merger  
11       Order, Docket 98-0555. In addition to my project management work, I am  
12       involved in Staff activities related to Condition 30 of the Ameritech Illinois  
13       merger, which focuses on the performance measurements and the  
14       performance remedy plan in Illinois. I am also involved with Staff's merger  
15       compliance activities and wholesale service quality initiatives. I have  
16       worked for the Illinois Commerce Commission since January 2000.

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18   **Q.    Please describe your qualifications and background.**

19   A.    I graduated from Bucknell University, Lewisburg, PA, with a Bachelor of  
20       Science degree in Computer Science and Engineering in 1992. I also  
21       received a minor in Mathematics.

22

23 **Q. Please describe your work experience prior to working for the Illinois**  
24 **Commerce Commission.**

25 A. Prior to working for the Commission I was employed by Andersen  
26 Consulting, now known as Accenture, as a Manager in their  
27 Telecommunications Division. During my time with Andersen Consulting I  
28 gained extensive experience in all phases of software development. I  
29 developed both functional business requirements and technical  
30 specifications, planned application architectures, designed relational  
31 databases, developed mainframe and client server applications, wrote  
32 technical reference guides, conducted user training sections, directed  
33 project teams, wrote business proposals and fostered client relationships.  
34 I worked in both the healthcare and telecommunication industries. For  
35 more than three years I worked on engagements involving Ameritech  
36 Illinois.

37

38 **Q. What is the purpose of your Phase 1 testimony?**

39 A. I will present my analysis, assessment and findings with regard to Illinois  
40 Bell Telephone Company's ("Ameritech Illinois", "AI", "Company")  
41 compliance with checklist item 2—

42 Specifically, I address access to OSS under checklist item 2. -

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**Q. Please provide a summary of your Phase 1 findings and recommendations.**

A. As explained below in my testimony, Ameritech Illinois fails to provide or generally offer nondiscriminatory access to OSS network elements in accordance with the requirements of 251(c)(3) of the Federal Telecommunications Act ("Act"). I recommend that this Commission require Ameritech Illinois to address the problems associated with its loss notification process and with its loss notification performance measure prior to providing a positive recommendation to the Federal Communications Commission regarding Ameritech Illinois' compliance with the requirements of Section 271.

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83 **Q. Does your testimony in Phase 1 of this proceeding address all of the**  
84 **issues concerning OSS access under checklist item 2 and public**  
85 **interest?**

86 **A.** No. I will address the majority of issues and concerns related to  
87 Ameritech Illinois' OSS access during Phase 2 of this proceeding. Phase  
88 2 will begin once KPMG Consulting has completed its independent review  
89 of Ameritech Illinois' OSS.—

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93 **Q. You state that KPMG Consulting is completing an independent**  
94 **review of Ameritech Illinois' OSS and business processes, what is**  
95 **the basis and purpose of the independent third party review of**  
96 **Ameritech Illinois' OSS?**

97 **A.** The independent third party review in Illinois is being conducted by KPMG  
98 Consulting pursuant to Condition 29 of the SBC/Ameritech Merger Order  
99 in Docket 98-0555 ("Merger Order"). The scope of the third party review  
100 was set based upon the parameters outlined in Condition 29 of the Merger  
101 Order. The Commission required Ameritech Illinois to work in  
102 collaboration with CLECs and Commission Staff in determining the set of  
103 changes Ameritech Illinois would make to its OSS. The independent  
104 third party review is designed specifically to determine whether or not  
105 Ameritech Illinois is meeting the specific OSS requirements of the Merger  
106 Order and as further defined by the collaborative.

107

108 **Q. Has the FCC recommended that an independent review of a Bell**  
109 **Operating Company's ("BOC") OSS and business processes be**  
110 **conducted as part of, or in advance of, a 271 proceeding?**

111 **A.** The FCC believes that OSS testing provides an objective means by which  
112 to evaluate a BOC's OSS readiness and may otherwise strengthen an

113 application where competitors challenge the BOC's evidence. The FCC  
114 also points out that the persuasiveness of a third-party review is  
115 dependent upon the qualifications, experience and independence of the  
116 third party and the conditions and scope of the review itself.<sup>1</sup> If third party  
117 testing has not been conducted for a given OSS function, then the  
118 evidence necessary to prove whether or not the OSS functions are  
119 operationally ready is commercial usage.<sup>2</sup>

120  
121 **Q. Does the scope of the independent third party review encompass all**  
122 **areas of OSS relevant for the Illinois Commission to recommend**  
123 **section 271 approval?**

124 A. It is unknown, at this time, whether or not the review currently being  
125 conducted encompasses all areas of OSS necessary for the Illinois  
126 Commission to support a section 271 approval. Since the independent  
127 third party review was ordered pursuant to the Merger Order, it is possible  
128 that its current scope may be different than what this Commission would  
129 determine for purposes of a 271 evaluation. Therefore, unless the  
130 independent third party review is modified to address any deficiencies  
131 identified in this case, to the extent they are not already included, the

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<sup>1</sup> *Application of Ameritech Michigan Pursuant to Section 271 of the Communications Act of 1934, as amended, to Provide In-Region, InterLATA Services in Michigan*, CC Docket # 97-137, FCC 97-298 ¶216 (rel. Aug. 19, 1997) ("Ameritech Michigan Order").

<sup>2</sup> *Application by Bell Atlantic New York for Authorization Under Section 271 of the Communications Act To Provide In-Region, InterLATA Service in the State of New York*, CC Docket 99-295, FCC 99-404, ¶189 (rel. Dec. 22, 1999) ("Bell Atlantic New York Order").

Commission may only be able to rely upon commercial activity as data or evidence for those areas.

**Checklist Item 2 – Unbundled Network Elements**

**Q. Please explain the Section 271 requirement pertaining to checklist item 2, Unbundled Network Elements.**

A. The second item of the competitive checklist requires that carriers provide nondiscriminatory access to network elements in accordance with the requirements of sections 251(c)(3) and 252(d)(1) of the Act<sup>3</sup>. The FCC has interpreted this to include access to OSS and other UNEs, UNE combinations and the pricing of UNEs.<sup>4</sup>

**Q. Does your testimony address all aspects of checklist item 2?**

A. No, I will only address issues pertaining to OSS access. Issues pertaining to UNE availability and UNE combinations are addressed in the testimony of Staff witness Jim Zolnierrek (ICC Staff Ex. 3.0) and issues pertaining to UNE Pricing are addressed in the testimony of Staff witness Robert Koch (ICC Staff Ex. 6.0).

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<sup>3</sup> 47 U.S.C. § 271(c)(2)(B)(ii).

<sup>4</sup> *Joint Application by SBC Communications Inc. et al. to Section 271 of the Telecommunications Act of 1996 To Provide In-Region, InterLATA Services in Arkansas and Missouri*, CC Docket 01-194, FCC 01-338, at 8-40 (rel. Nov. 16, 2001) ("ARK/MO 271 Order").



152 **Q. What specific aspects of checklist item 2, access to OSS, will you**  
153 **provide testimony for in Phase 1?**

154 A. My Phase 1 testimony on OSS access only covers Ameritech Illinois' loss  
155 notification process to its wholesale customers. I will address all other  
156 items pertaining to OSS access in Phase 2 of this proceeding.

157

158 **Q. Why are you addressing this one item pertaining to OSS access in**  
159 **Phase 1, as opposed to Phase 2 of this docket?**

160 A. The issue pertaining to loss notifications may or may not become apparent  
161 in the third party review being conducted by KPMG Consulting. Therefore,  
162 since it is known that there are problems with Ameritech Illinois' loss  
163 notifications now and these issues are causing problems for Illinois  
164 consumers and Ameritech Illinois' wholesale customers, it is best that the  
165 issue be raised to this Commission in Phase 1. By raising this issue now  
166 it will allow Ameritech Illinois sufficient time to address problems that are  
167 known to exist before proceeding to Phase 2 of this case.

168

169 **Q. What are Operational Support Systems ("OSS") and what are its**  
170 **various components?**

171 A. Operational support systems are the various computer systems, business  
172 processes and personnel used by a company to conduct business with its  
173 customers. The OSS being referred to in this proceeding are the systems,  
174 business processes and personnel used by Ameritech Illinois to

175 communicate with its wholesale customers. The typical OSS functions  
176 evaluated by states and the FCC in a 271 review include pre-ordering,  
177 ordering, provisioning, maintenance and repair, billing and change  
178 management. The FCC has stated that access to OSS functions fall  
179 squarely within an incumbent LEC's duty under Section 251(c)(3). Section  
180 251(c)(3) requires an incumbent LEC to provide unbundled network  
181 elements under terms and conditions that are nondiscriminatory and just  
182 and reasonable. Further, an incumbent LEC's duty under Section  
183 251(c)(4) is to offer resale services without imposing any limitations or  
184 conditions that are discriminatory or unreasonable<sup>5</sup>.

185  
186 **Q. Are you aware, at this time, of any OSS components for which**  
187 **Ameritech Illinois fails to provide nondiscriminatory access to**  
188 **network elements as required in checklist item 2?**

189 **A.** Yes. It is my belief that Ameritech Illinois fails to provide  
190 nondiscriminatory access to its OSS in the situation of loss notifications.

191  
192 **Q. What are loss notifications and why are they important?**

193 **A.** Loss notifications are messages sent from Ameritech Illinois to a carrier,  
194 notifying the carrier that one of its end users has switched to another  
195 carrier. In the industry loss notifications are commonly referred to as 836  
196 transactions or 836 reports. Ameritech Illinois provides loss notifications

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<sup>5</sup> Bell Atlantic New York Order, 15 FCC Rcd at 3990, para. 84.

to carriers that use Ameritech Illinois' facilities to offer service to its end users.

One purpose of the loss notification is to notify the carrier to cease billing the end user for the service that was switched. If Ameritech Illinois does not send accurate and timely loss notifications to its wholesale customers, then the wholesale customer does not know to stop billing the end user for the service that Ameritech has switched to itself or to another provider. This typically results in an end user being billed by two separate providers for the same service.

In addition, if an end user calls to complain to the wholesaler who originally provided service to the end user, the wholesaler may still not know that the end user is no longer its customer. This second situation would raise, in the end user, definite questions about the credibility of the wholesale provider. It is also possible that when an end user experiences this type of problem with a competitive local exchange carrier that the reputation of all competitive carriers may be tarnished in the end user's mind, thereby causing the end user to not choose an alternative local carrier in the future.

**Q. Has the Commission received complaints from consumers regarding being billed by multiple carriers for the same service?**

220 A. Yes, our Commission's Consumer Services Division has received  
221 numerous complaints on this issue over the past six months.

222

223 **Q. Did Ameritech Illinois address the loss notification process or any**  
224 **problems associated with that process, in either its direct testimony**  
225 **or in its affidavits?**

226 A. No, based upon my review of the testimony, and to the best of my  
227 knowledge, Ameritech did not address the loss notification process or any  
228 known problems that exist with the process.

229

230 **Q. Has SBC/Ameritech admitted that it has a problem in providing loss**  
231 **notifications to its wholesale customers?**

232 A. Yes, in ICC Docket 02-0160<sup>6</sup> "Ameritech Illinois has acknowledged  
233 problems with the Line Loss Notification process," but it has not discussed  
234 this problem in the affidavits or direct testimony it filed for this proceeding.  
235 Moreover, I am aware that, in Michigan, SBC/Ameritech has  
236 communicated five different situations in which it has encountered  
237 problems providing loss notifications to its customers. SBC/Ameritech has  
238 reported two different situations that may occur when a CLEC's end user  
239 requests a partial migration of lines<sup>7</sup>. When a partial migration includes  
240 the main line on the account, SBC/Ameritech acknowledged, in the

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<sup>6</sup> IL Docket 02-0160, Supplemental response of Illinois Bell Telephone Company to request for emergency relief, para. 3.

<sup>7</sup> A partial migration occurs when some but not all lines on an account are being moved to another carrier.

241 Michigan proceeding, that at times it would send line loss notifications for  
242 all lines on the account instead of just the lines on the account for which  
243 the switch was requested.<sup>8</sup> The second partial migration situation  
244 SBC/Ameritech identified in Michigan affects those orders that involve  
245 manual handling by the Local Service Center (therefore the order is not  
246 handled electronically from start to finish). In this second situation  
247 SBC/Ameritech reports that it may not send any line loss notifications.<sup>9</sup>  
248 SBC/Ameritech also identified other situations where line loss reports are  
249 not sent due to manual handling situations in some single CLEC to CLEC  
250 migrations and in single migrations to SBC/Ameritech<sup>10</sup>.

251

252 **Q. How are the loss notification problems SBC/Ameritech identified in**  
253 **Michigan relevant to Illinois?**

254 **A.** It is my understanding that the process SBC/Ameritech uses to generate  
255 loss notifications is relatively the same for all five Ameritech states.  
256 Therefore, if loss notification problems exist in Michigan and impact  
257 wholesale customers and consumers in Michigan the problems also exist  
258 in Illinois and affect Ameritech Illinois' wholesale customers and Illinois  
259 consumers.

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<sup>8</sup> Michigan Case No. U-12320, Ameritech Michigan's supplemental report on the line loss notification issue filed on January 29, 2002 at 6. ICC Staff Exhibit 11.0, Schedule 11.01.

<sup>9</sup> Id.

<sup>10</sup> Michigan Case No. U-12320, Ameritech Michigan's interim report on the line loss notification issue filed on January 9, 2002 at 5. ICC Staff Exhibit 11.0, Schedule 11.02.

261 **Q. Does Ameritech Illinois generate loss notification transactions to**  
262 **Ameritech retail when an end user switches from Ameritech to a**  
263 **competing carrier?**

264 A. Yes, It is my understanding that Ameritech's wholesale organization does  
265 generate a loss notification or 836 transaction to its retail arm in the same  
266 time and manner that loss notifications are generated for other carriers.  
267 However, Ameritech Illinois has stated that its retail organization does not  
268 use the loss notifications transactions.

269

270 **Q. Why doesn't Ameritech's retail arm use the loss notifications, or 836**  
271 **transactions, that are in parity with those sent to CLECs?**

272 A. Ameritech retail does not use the loss notifications or 836 transactions it  
273 generates because Ameritech Illinois uses a separate process to notify its  
274 retail organization that it has lost a customer. The separate retail line loss  
275 notification process is triggered by a different set of events than the 836  
276 loss notification transactions. Therefore, it is highly likely that the loss  
277 notification problems, some of which were previously outlined in my  
278 testimony, do not affect Ameritech retail but they do impact Ameritech's  
279 wholesale customers. It also demonstrates that Ameritech Illinois does  
280 not provide line loss notifications to its wholesale customers in parity with  
281 Ameritech retail.

282

283   **Q.**    How do the loss notification problems that Ameritech Illinois has  
284           recognized exist and the difference in loss notification processes  
285           between Ameritech's wholesale customers and its retail organization  
286           demonstrate that Ameritech Illinois does not provide  
287           nondiscriminatory access to its OSS in accordance with the  
288           requirements of checklist item 2?

289   **A.**    In the situation where a CLEC is using Ameritech's facilities to provide  
290           service to an end user, Ameritech Illinois performs the work within its  
291           network to indicate that the CLEC is the provider. When a CLEC's end  
292           user requests that it be switched to either Ameritech Illinois, or to another  
293           CLEC, Ameritech Illinois is the company that performs the work in its  
294           network to make the switch. The carrier who is losing an end user ("losing  
295           carrier") can't directly access Ameritech Illinois' switch, or network, to  
296           determine if it is still the one providing service to the end user. If the  
297           losing carrier does not receive the loss notification, the losing carrier may  
298           discovers it no longer provides service to the end user if the end user  
299           contacts the CLEC directly or the CLEC realizes that Ameritech Illinois has  
300           stopped billing them for the line. In contrast, when Ameritech Illinois' retail  
301           operations need to determine whether or not it's providing service to an  
302           end user, it merely needs to look at its own switch or network. Ameritech  
303           Illinois is able to do this because it owns the network facilities.

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The FCC has in prior section 271 orders stated that for those functions the BOC provides to competing carriers that are analogous to the functions a BOC provides to itself in connection with its own retail service offerings, the BOC must provide access to competing carriers in "substantially the same time and manner" as it provides access to itself.<sup>11</sup> Therefore, where a retail analogue exists, a BOC must provide a level of access that is substantially similar to the level of access that the BOC provides to itself, its customers, or its affiliates. Similarity is determined in terms of quality, accuracy and timeliness.<sup>12</sup> Therefore, the loss notification problems described above demonstrate that Ameritech Illinois does not provide non-discriminatory access to its OSS in accordance with the requirements of checklist 2, because Ameritech Illinois fails to provide loss notifications to its wholesale customers in substantially the same time and manner as it provides access to itself.

**Q. Are there any performance measures that summarize Ameritech Illinois' performance in delivering loss notifications to its wholesale customers?**

**A.** Yes. Performance measure, MI 13, reports "the percentage of loss notifications (which Ameritech provides to the carrier that "loses" a

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<sup>11</sup> *Application by SBC Communications Inc. et al. Pursuant to Section 271 of the Telecommunications Act of 1996 To Provide In-Region, InterLATA Services in Texas*, CC Docket 00-65, FCC 00-238, ¶44 at 8-40 (rel. June 30, 2000) ("SWBT Texas Order"); Bell Atlantic New York Order, para. 44.

<sup>12</sup> Bell Atlantic New York Order, para. 44.



customer) issued within one hour after the related completion notice is sent to the new carrier"<sup>13</sup>.

**Q. What is the aggregate data that Ameritech Illinois has reported for performance measure MI 13 in Illinois for the months of November and December 2001 and January 2002?**

**A.** As of March 5, 2002, Ameritech Illinois reports that its performance for measure MI 13 on an aggregate basis, per month, for the percentage of loss notifications sent within 1 hour of the service order completion notice being sent to the new carrier is as follows<sup>14</sup>:

	<i>Resale</i>	<i>LNP<sup>15</sup></i>	<i>UNE-P</i>	<i>Loop</i>
<i>Nov. 2001</i>	86.34%	99.94%		100%
<i>Dec. 2001</i>	99.06%	99.65%		
<i>Jan. 2002</i>	100.00%	99.78%	99.95%	

**Q. Do you know why there is no UNE-P data available for November and December 2001 and no loop data for December 2001 and January 2002?**

**A.** For reasons unknown to me, Ameritech Illinois did not report data for those products for those time periods.

<sup>13</sup> Ameritech Ehr Affidavit at 254.

<sup>14</sup> MI 13 aggregate performance measure data downloaded from <https://clec.sbc.com> by Staff witness Weber on February 5, 2002. ICC Staff Exhibit 11.0, Schedule 11.03

<sup>15</sup> LNP means a loop with number portability.

346 **Q. Is the data presented in the table above for Ameritech Illinois**  
347 **performance measure MI 13 consistent with the loss notification**  
348 **problems SBC/Ameritech acknowledged and the consumer**  
349 **complaints the Commission has received on this issue?**

350 **A.** No. The data reported on February 5, 2002 by Ameritech Illinois for  
351 performance measure MI 13 on its CLEC Online performance  
352 measurement website, is not consistent with comments the Commission  
353 has received from Illinois consumers and carriers over the past six  
354 months. From the data it does not appear that Ameritech Illinois is  
355 experiencing problems with the loss notification process as has been  
356 acknowledged by SBC/Ameritech<sup>16</sup>.

357

358 **Q. What reasons can you provide to explain this inconsistency?**

359 **A.** There are several reasons why performance measure MI 13 would not  
360 reflect the problems associated with loss notifications. First, the business  
361 rule definition states that MI 13 reports the percentage of loss notifications  
362 sent to the losing carrier within 1 hour of the service order completion  
363 notice being sent to the end user's new carrier<sup>17</sup>. Therefore, if Ameritech  
364 never sends a service order completion notice to the new carrier, then the

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<sup>16</sup> IL Docket 02-0160, Supplemental response of Illinois Bell Telephone Company to request for emergency relief, para. 3.

<sup>17</sup> SBC/Ameritech business rule document for performance measure MI 13 downloaded from <https://clec.sbc.com> by Staff witness Weber on February 14, 2002. ICC Staff Exhibit 11.0, Schedule 11.04. This business rule document is also contained in Ameritech Affidavit, James D. Ehr, Appendix A.

loss notification would never be sent to the losing carrier, and the error would not be reported as part of MI 13.

Second, if service order completion notices are sent late, or are delayed, then MI 13 will not account for the delay. MI 13 does not account for the delay since it only measures the time from when the service order completion notice is sent to the new carrier and not from when the actual work to disconnect the line was completed<sup>18</sup>.

Third, the partial migration problems identified by SBC/Ameritech, that I noted earlier in my testimony, would not be reflected in MI 13 because the loss notifications that should never have been sent are actually included in MI 13 (when they shouldn't be). Further, the loss notifications that are never sent are not included in MI 13 because the measure does not include loss notifications that are never sent.

Lastly, the loss notifications involving manual process handling, that SBC/Ameritech failed to send, also would not be reflected in MI 13. For the foregoing reasons performance measure MI 13, as it is designed and calculated today, does not and cannot accurately report Ameritech Illinois'

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<sup>18</sup> For the month of January 2002, Ameritech Illinois reported the following aggregate numbers for PM 7.1, percent mechanized completions reported within on day of work completion for resale, UNE and Combinations respectively; 97.80%, 96.51% and 97.99%. The benchmarks established for this metric is 99%. Staff witness Weber recorded this data from <https://clec.sbc.com> on February 5, 2002. In addition, KPMG Consulting released Exception Report 18; ICC Staff Exhibit 11.0, Schedule 11.05, that provides several examples of Ameritech's systems providing late service order completion (SOC) responses.

performance related to loss notifications. Accordingly, it should not be used as an indicator of Ameritech Illinois' performance in providing loss notifications.

**Q. Are you aware of any other proceedings in which the loss notification problems of SBC/Ameritech are being discussed?**

**A.** Yes, loss notification issues are also being discussed in a separate Illinois emergency complaint case initiated by Z-Tel Communications<sup>19</sup> and in Michigan's 271 proceeding<sup>20</sup>. In the Michigan 271 proceeding, the Michigan Commission released an interim order on December 20, 2001 which stated that Ameritech Michigan's failure to provide timely notification of migrations from one CLEC to another and back to Ameritech Michigan, is anticompetitive and an egregious neglect of Ameritech's duty. The interim order further demands that Ameritech Michigan address the problems that exist and provide a report back on its efforts to resolve the problems.<sup>21</sup>

**Q. Please summarize your critique of Ameritech Illinois' policies, procedures and reporting methods with respect to the loss notification process.**

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<sup>19</sup> Illinois Docket 02-0160.

<sup>20</sup> Michigan Case No. U-12320.

<sup>21</sup> Michigan Case No. U-12320, Opinion and Order dated December 20, 2001 at 6. ICC Staff Exhibit 11.0, Schedule 11.06.

405 A. Ameritech Illinois fails to provide accurate line loss reports to its wholesale  
406 customers, which has caused situations of duplicate billing to end users  
407 and has potentially negatively affected the credibility of Ameritech's  
408 competitors. The performance measure that Ameritech Illinois produces  
409 to demonstrate its level of service in providing loss notifications, MI 13,  
410 fails to account for Ameritech Illinois' performance in providing loss  
411 notifications. Also, Ameritech Illinois' failure to provide loss notifications to  
412 carriers in the same manner and timeframe as it does to its retail  
413 organization clearly indicates that Ameritech Illinois fails to provide  
414 nondiscriminatory access to loss notifications in accordance with the  
415 checklist item 2.

416

417 Q. **What are your recommendations for Ameritech Illinois to address the**  
418 **shortcomings you have noted?**

419 A. In order to address the issues I have identified above, the Commission  
420 should require the following of Ameritech Illinois:

421 I. Correct the loss notification issues that SBC/Ameritech  
422 acknowledges exist, in MI Case No. U-12320, with partial migration  
423 of accounts;

424 II. Re-train Ameritech Illinois personnel to prevent loss notification  
425 problems arising from manual handling errors in the local service  
426 centers;

- 427           III.     Determine if other situations exists that cause loss notifications to  
428                     be inaccurate, or untimely, and require Ameritech Illinois to correct  
429                     those situations immediately;
- 430           IV.     Clearly state all problems Ameritech Illinois has uncovered related  
431                     to loss notifications since January 2001 and communicate these  
432                     situations in an Accessible Letter<sup>22</sup> to the entire CLEC community.  
433                     The Accessible Letter should also indicate when the problem was  
434                     first identified, what versions of Ameritech's software the problem is  
435                     applicable to, what action Ameritech Illinois has taken if any to  
436                     correct each issue and when the action was taken, as well as any  
437                     planned or future action Ameritech Illinois plans to take and an  
438                     estimate of when the actions will be taken;
- 439           V.     On a CLEC-by-CLEC basis, Ameritech Illinois should determine the  
440                     accounts for which loss notifications have never been sent or were  
441                     sent *incorrectly and communicate these instances to the affected*  
442                     CLECs. If problems continue to persist then Ameritech Illinois  
443                     should be required to perform this reconciliation process on a  
444                     monthly basis until all issues have been resolved;
- 445           VI.     Continue to meet with CLECs, on an as needed basis, to discuss  
446                     the problems associated with loss notifications and the actions  
447                     Ameritech Illinois is taking to address the issues;

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<sup>22</sup> Accessible letters are the primary vehicles by which Ameritech communicates to its wholesale customers. They are usually electronic documents sent by Ameritech via email.

VII. Modify the process Ameritech Illinois uses to notify its retail organization of a customer loss or the process Ameritech Illinois uses to notify its wholesale carriers of a customer loss to bring them into parity with one another.

VIII. Modify the calculation, business rules and exclusions associated with performance measure MI 13 to accurately capture how long it takes Ameritech Illinois to send a loss notification, and to reflect the fact that MI 13 does not include loss notifications that are never sent.

The calculation should be modified so that the clock starts when the work to disconnect the account from the losing carrier was completed as opposed to the date the service order completion notice was sent to the new carrier.

The business rule should be modified to the following: "The percentage of customer loss notifications sent to carriers where the elapsed time from the completion of the disconnect provisioning work to the time that the loss notification (EDI 836 message) is transmitted to the losing carrier is less than one hour".

Finally, an additional exclusion should be added to the business rule document to clearly delineate that loss notifications that are not sent by Ameritech Illinois are not included in the measure.

IX. Include the modified performance measure MI 13 in the Ameritech Illinois Performance Remedy Plan or whatever plan is determined to be its "Anti-backsliding Plan" as part of this 271 proceeding, and reevaluate the benchmark level set for the measure. Today, no remedy payments are tied to performance measure MI 13.

Any changes Ameritech Illinois makes to its current processes and procedures regarding loss notifications or its performance measures that track loss notifications should be subject to review in Phase 2 of this proceeding.

**Q. Please summarize your recommendation to this Commission regarding Ameritech Illinois' loss notifications problems?**

A. I recommend that this Commission require Ameritech Illinois to address the problems associated with its loss notifications by requiring it to address the nine items outlined above, prior to providing a positive recommendation to the Federal Communications Commission regarding Ameritech Illinois; compliance with the requirements of checklist item 2 of Section 271.



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<sup>46</sup> Ameritech Direct Testimony, James D. Ehr, 202-212.

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<sup>47</sup> *Application of Verizon New York Inc. et al. for Authorization To Provide In-Region, InterLATA Services in Connecticut*, CC Docket 01-100, FCC 01-208, ¶7 (rel. July 20, 2001) ("Verizon Connecticut Order").

<sup>48</sup> Ameritech Affidavit, James D. Ehr, Attachment C.

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790 **Q. Does this conclude your testimony?**

791 **A.** Yes, it does.

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